

**SEALED**

CLERK'S OFFICE U.S. DIST. COURT  
AT ABINGDON, VA  
FILED

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
BIG STONE GAP DIVISION

JUN 22 2015

JULIA C. DODDNEY, CLERK  
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UNITED STATES OF AMERICA

Case No. 2:15CR00011

v.

JOHNATHON AARON REYNOLDS  
and ERICA J. REYNOLDS

**Violations:**

18 U.S.C. § 1001(a)(2) & (a)(3)  
18 U.S.C. § 1791(a)(1) & (a)(2)  
21 U.S.C. § 841(a)(1)  
21 U.S.C. § 846

**INDICTMENT**

The Grand Jury charges, and includes in each count of this Indictment, that at all times relevant to this Indictment:

1. JOHNATHON AARON REYNOLDS was a federal inmate at the United States Penitentiary (USP) Lee, located in Lee County, Virginia.

2. USP Lee is a prison as defined in 18 U.S.C. § 1791(d)(4) and is located on federal land in Lee County, Virginia, in the Western District of Virginia.

3. Pursuant to 28 C.F.R. § 6.1, 28 C.F.R. § 511.12 and 28 C.F.R. § 541.3, Buprenorphine is a prohibited object.

**COUNT ONE**

The Grand Jury charges that:

1. On or about October 5, 2014, JOHNATHON AARON REYNOLDS possessed a prohibited object.

2. The prohibited object was Buprenorphine.

3. All in violation of Title 18, United States Code, Sections 1791(a)(2) and (d)(1)(B).

**COUNT TWO**

The Grand Jury charges that:

1. On or about October 5, 2014, ERICA J. REYNOLDS, in violation of a statute, rule and order issued under a statute, provided a prohibited object to an inmate at USP Lee.
2. The prohibited object was Buprenorphine.
3. All in violation of Title 18, United States Code, Sections 1791(a)(1) and (d)(1)(B).

**COUNT THREE**

The Grand Jury charges that:

1. On or about October 5, 2014, in the Western District of Virginia, in a matter within the jurisdiction of the executive branch of the Government of the United States, namely the Bureau of Prisons, ERICA J. REYNOLDS knowingly and willfully (a) made a materially false, fictitious and fraudulent statement and representation and (b) made and used a false writing and document knowing the same to contain a materially false, fictitious and fraudulent statement and entry.
2. Specifically, ERICA J. REYNOLDS falsely stated, represented and entered on a Bureau of Prisons' form that she did not possess drugs, narcotics and prescription drugs.
3. All in violation of Title 18, United States Code, Sections 1001(a)(2) and 1001(a)(3).

**COUNT FOUR**

The Grand Jury charges that:

1. On or about October 5, 2014, in the Western District of Virginia, ERICA J. REYNOLDS knowingly and intentionally distributed and possessed with the intent to distribute a mixture or substance containing a detectable amount of Buprenorphine, a Schedule III controlled substance.
2. All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(E).

**COUNT FIVE**

The Grand Jury charges that:

1. On or about October 5, 2014, in the Western District of Virginia, JOHNATHON AARON REYNOLDS knowingly and intentionally possessed with the intent to distribute a mixture or substance containing a detectable amount of Buprenorphine, a Schedule III controlled substance.

2. All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(E).

**COUNT SIX**

1. On or about October 5, 2014, in the Western District of Virginia and elsewhere, JOHNATHON AARON REYNOLDS and ERICA J. REYNOLDS conspired to knowingly and intentionally distribute and possess with the intent to distribute a mixture or substance containing a detectable amount of Buprenorphine, a Schedule III controlled substance.

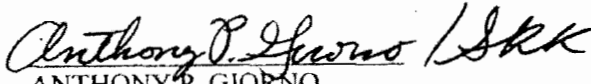
2. To effect the object of the conspiracy, the conspirators did certain acts including, but not limited to, the following act:

On or about October 5, 2014, ERICA J. REYNOLDS provided a mixture or substance containing a detectable amount of Buprenorphine to JOHNATHON AARON REYNOLDS.

3. All in violation of Title 21, United States Code, Sections 841(a)(1) and 846.

A TRUE BILL, this 22<sup>nd</sup> day of June, 2015.

/s Grand Jury Foreperson

  
ANTHONY P. GIORNO  
Acting United States Attorney